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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COMMISSIONER OF INSURANCE FOR
THE STATE OF NEVADA AS RECEIVER
OF LEWIS AND CLARK LTC RISK
RETENTION GROUP, INC.,

Plaintiff,

V.

IRONSHORE SPECIALTY INSURANCE COMPANY; INDIAN HARBOR INSURANCE COMPANY f/k/a CATLIN INSURANCE COMPANY INC.; ILLINOIS NATIONAL INSURANCE COMPANY; RSUI INDEMNITY COMPANY; ENDURANCE AMERICAN SPECIALTY INSURANCE COMPANY; US RE CONSULTING AGENCY SERVICES, INC., a Nevada corporation; UNI-TER UNDERWRITING MANAGEMENT CORP., UNI-TER CLAIMS SERVICES CORP., U.S. RE CORPORATION; LEWIS & CLARK LTC RISK RETENTION GROUP INC., a Nevada corporation; TAL PICCIONE, an individual; DOES 1 through 100, and each of them, inclusive; ROE COMPANIES 1through 100, and each of them, inclusive.

Defendants.

Plaintiff, Commissioner of Insurance for the State of Nevada as Receiver of Lewis and Clark LTC Risk Retention Group, Inc. (“Plaintiff” or “Commissioner”) and Defendant, Ironshore

Case No. 2:25-cv-00789

**STIPULATION FOR ENLARGEMENT OF
TIME FOR DEFENDANT IRONSHORE
SPECIALTY INSURANCE COMPANY'S
RESPONSE TO COMPLAINT
(First Request)**

1 Specialty Insurance Company (“Ironshore”), by and through their counsel of record, hereby
 2 stipulate and agree as follows:

3 This is the first stipulation to extend the time for Ironshore to respond to Plaintiff’s
 4 Complaint.

5 Plaintiff served the Division of Insurance with the Summons and Complaint on April 16,
 6 2025. NRS 680A.260(1). The next day on April 17, 2025 the Division of Insurance forwarded the
 7 Summons and Complaint to Ironshore’s registered agent. *Id.*, at (2). On April 17, 2025, service on
 8 Ironshore was complete. The deadline for Ironshore to respond to the Complaint is April 16, 2025.
 9 *Id.* at (3); FRCP 81(c). On May 13, 2025, as a matter of professional courtesy, Plaintiff granted
 10 Ironshore up to and including May 30, 2025 to respond to its Complaint.

11 Good cause exists to extend the deadline for Ironshore to respond to the Compliant. Lead
 12 counsel for Ironshore will be out of the office on vacation when the response to the Complaint is
 13 due. The extra time is needed to better prioritize her workload as she meets firm deadlines in other
 14 matters prior to her departure. Although Ironshore’s counsel has been diligent in evaluating
 15 Plaintiff’s Complaint, given the fact pattern alleged and the causes of action asserted by Plaintiff,
 16 additional time is needed for Ironshore to fairly and adequately respond to the Complaint.

17 By entering into this stipulation Plaintiff does not waive, or intend to waive, any rights in
 18 this matter, including, without limitation, any and all rights related to Plaintiff’s ability to seek
 19 remand of this matter to the Eighth Judicial District Court (“State Court”) in Nevada pursuant to 28
 20 U.S.C. section 1447, or any other right or remedy, which Plaintiff expressly reserves.

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1 Counsel certifies that this request is made in good faith and not for the purposes of delay and
2 request that it be granted by the Court.

3 DATED this day of 14th day of May, 2025

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5 **WILSON, ELSER, MOSKOWITZ, EDELMAN
& DICKER LLP**

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7 BY: /s/Nicholas F. Adams
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11 *Attorneys for Defendant Ironshore Specialty
Insurance Company*

12 DATED this day of 14th day of May, 2024

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14 **WIRTHLIN & VERLAINE**

15
16 BY: /s/Brenoch R. Wirthlin
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20 **ORDER**

21 **IT IS SO ORDERED.**

22 DATED this 14th day of May, 2025.

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UNITED STATES MAGISTRATE JUDGE